

Exhibit 14

1 SHERMAN KASSOF California Bar #066383
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6 *Counsel for Indirect Purchaser Plaintiffs*

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12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**

14 **SAN FRANCISCO DIVISION**

15 **IN RE: CATHODE RAY TUBE (CRT)**
16 **ANTITRUST LITIGATION**

Case No. 3:07-cv-5944
MDL No. 1917

17 **CLASS ACTION**

18 This Document Relates to:

19 **DECLARATION OF SHERMAN KASSOF** _____
IN SUPPORT OF PLAINTIFFS'
APPLICATION FOR ATTORNEYS' FEES,
EXPENSES AND INCENTIVE AWARDS

20
21 All Indirect Purchaser Actions

Judge: Honorable Samuel Conti
Courtroom One, 17th Floor

1 I, Sherman Kassof, declare as follows:

2 I am an attorney licensed to practice before the Courts of the State of California and before
3 the United States District Courts for the Northern and the Central Districts of California and the
4 Eastern District of Michigan and am a principal of the law firm of the Law Offices of Sherman
5 Kassof. I have personal knowledge of the facts stated in this declaration and, if called as a witness,
6 I could and would testify competently to them. I make this declaration in support of my firm's
7 request for attorneys' fees and reimbursement of litigation expenses, as set forth in Plaintiffs'
8 Application for Attorneys' Fees, Expenses and Incentive Awards.

9

10 1. My firm is counsel of record in this case, and represents named plaintiff Adrienne
11 Belai. A brief description of my firm is attached as Exhibit 1 and incorporated herein by
12 reference.

13 2. Throughout the course of this litigation, my firm kept files contemporaneously
14 documenting all time spent, including tasks performed, and expenses incurred and transmitted
15 those reports on a regular basis to Lead Counsel. All of the time and expenses reported by my firm
16 were incurred for the benefit of the Indirect Purchaser Plaintiffs ("IPPs").

17 3. During the course of this litigation, my firm has been involved in the following
18 tasks and activities on behalf of the IPPs. All of this work was assigned and/or approved by Lead
19 Counsel.

20 My firm undertook a project, spanning five years, to analyze and evaluate electronic
21 documents obtained on discovery, mainly in Korean and Chinese. We found and evaluated an
22 expert consultant in the area of CRT manufacturer business organization and pricing. We effected
23 service of process on an Asian corporate defendant with close government connections which
24 could not be served in or from the United States.

25

26 4. The schedule attached as Exhibit 2, and incorporated herein, is a detailed summary
27 of the amount of time spent by my firm's partners, attorneys and professional support staff who

were involved in this litigation. It does not include any time devoted to preparing this declaration or otherwise pertaining to the Joint Fee Petition. The lodestar calculation is based on my firm's historical billing rates in effect at the time services were performed. Exhibit 2 was prepared from contemporaneous time records regularly prepared and maintained by my firm. Those records have been provided to Lead Counsel and I authorize them to be submitted for inspection by the Court if necessary. The hourly rates for my firm's partners, attorneys and professional support staff included in Exhibit 2 were at the time the work was performed the usual and customary hourly rates charged for their services in similar complex litigation.

5. The total number of hours reasonably expended on this litigation by my firm from inception to May 31, 2015 is 6,294.9 hours. The total lodestar for my firm at historical rates is \$2,389,762.50. The total lodestar for my firm at current rates is \$2,391,135.00. Expense items are billed separately and are not duplicated in my firm's lodestar.

6. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, invoices, receipts, check records and other source materials and accurately reflect the expenses incurred. My firm's expense records are available for inspection by the Court if necessary.

7. My firm incurred a total of \$51,521.70 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. Of this amount, \$50,000.00 was for assessment payments for common litigation expenses or direct payments to experts or other vendors made at the request of Lead Counsel, and an additional \$1,521.70 was for non-common litigation expenses incurred by my firm, such as travel, meals and lodging, copying, legal research, telephone, etc. A summary of those expenses by category is attached as Exhibit 3.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 20th day of July, 2015 in Lafayette, California.

/s/Sherman Kassof
Sherman Kassof

Exhibit 1

LITIGATION BACKGROUND OF SHERMAN KASSOF

I am admitted to practice before the Bar of the State of California and before the United States District Courts for the Northern and the Central Districts of California. I graduated Hastings College of the Law in 1975 and was admitted to the Bar that same year. I have since been engaged in civil litigation practice. Examples of my experience in cases involving complex litigation and class representation follow.

1. In 1982 through 1984, I was co-counsel for plaintiff in Bigon v. Wulff, Hansen & Co., et al., Marin County Superior Court action number 108311. We sought to recover damages for an unsophisticated securities brokerage customer who was induced to buy forged or bogus municipal bonds by her account representative in a "Ponzi" type scheme involving multiple forgeries. The case was removed to U.S. District Court, and, after substantial motion practice, remanded. In a subsequent settlement, plaintiff recovered approximately three times her out-of-pocket loss.

2. From 1986 to 1988, I was counsel for plaintiff in Miller v. Union Bank, et al., Contra Costa Superior Court action number 289331, a class action for recovery of pension fund administration charges levied, without proper notice, on Keogh-type pension accounts administered by Union Bank for retail customers of the members of the California Savings and Loan League. A court approved settlement provided for recovery, with interest, by the class members of substantially all fees that were charged without proper notice. Attorney fees and costs were paid by defendant Union Bank.

3. From 1986 to 1990, I was counsel for plaintiff in Tokay v. First Interstate Bank, N.A., Alameda County Superior Court action number 615013, a class action on behalf of the bank's credit card holders challenging late and overlimit charges on their accounts. After substantial discovery and motion practice, a settlement was entered into providing a cash refund to class members equivalent to the amount of the fees that were found to be excessive in the jury verdict in Beasley, et al., v. Wells Fargo Bank (¶4, below), a case challenging similar fees.

4. From 1986 to 1992, I was co-counsel for plaintiff along with the firm of Sturdevant and Sturdevant and S. Chandler Visher, Esq. in Beasley, et al., v. Wells Fargo Bank, San Francisco Superior Court action no. 861555, a class action on behalf of approximately 1.6 million credit card holders challenging Wells Fargo's late and overlimit charges on credit card accounts. In February 1989, a jury verdict was returned in for damages of approximately \$5.2 million. Defendant unsuccessfully appealed to the Court of Appeal and petitioned for review by the California Supreme Court, which petition was denied.

5. From 1988 to 1992, I was associate counsel in *Junglas v. General Motors* Corporation, Alameda County Superior Court Action No. 558051-6, a class action seeking damages for purchasers of 1981 Cadillac automobiles with malfunctioning "V8-6-4" engines. The settlement in this case provided all class members with a full cash recovery for all repair expenses plus certificates entitling them to a substantial discount on the purchase of any Cadillac vehicle.

6. From 1989 to 1993, I was counsel for plaintiff in Ferreira v. VMS Realty Partners, et al., U.S. District Court, Northern District of California, action no. C 90 1102 EFL, a class action seeking to recover losses by investors in a real property tax shelter partnership in which substantially all invested funds were lost. Ferreira was consolidated for pretrial proceedings in Re

1 VMS Limited Partnership Securities Litigation, U.S. District Court, Northern District of Illinois,
 2 action no. 90 C 2412. In 1991, a complex partial settlement was proposed concerning plaintiffs'
 3 claims against certain of the defendants. My client objected on grounds of economic inadequacy
 but the partial settlement was approved.

4 After further litigation against the remaining defendants, a settlement releasing the
 remaining defendants in exchange a settlement fund to be distributed among the class members
 was approved. While supporting the settlement in principal, we objected to certain provisions.
 5 These objections were ultimately resolved by compromise.

6 7. In January 1991, I brought an indirect purchaser (Cartwright Act) class action suit,
 McMahon v. Abbott Laboratories, Inc., et al., Contra Costa County Superior Court action no. C 91
 7 00434, on behalf of retail purchasers in California, against the major manufacturers of infant
 8 formula for damages resulting from anti-competitive conduct. We joined in a consolidated
 amended action, Gallman et al. v. Abbott Laboratories, Inc., et al., Alameda County Superior
 9 Court action no. 675679-1. Gallman was coordinated in Judicial Council Coordination Proceeding
 no. 2557, In Re California Indirect Purchaser Infant Formula Antitrust Class Action Litigation. In
 10 late 1993, settlements with defendants were approved, yielding a net recovery to the class of
 11 \$13,900,000.00.

12 8. In 1994, together with co-counsel, I brought an indirect purchaser (Cartwright Act)
 class action suit, H. Azizian, Inc. v. The BOC Group, Inc., San Francisco Superior Court action
 13 960034, against the major suppliers of carbon dioxide gas used for soft drinks, for damages
 resulting from anti-competitive conduct. Azizian was coordinated in Liquid Carbon Dioxide
 14 Cases, JCCP No. 3012, San Diego Superior Court action# 674759. A settlement in 1995 provided
 15 cash compensation to overcharged buyers.

16 9. In June 1994, together with co-counsel, I brought an indirect purchaser (Cartwright
 Act) class action suit, Bel Marin Medical Center v. Eastman Kodak, et al. in San Francisco
 17 Superior Court, against the major suppliers of medical x-ray film, for damages resulting from anti-
 competitive conduct. Bel Marin was joined with similar other cases in San Francisco Superior
 18 Court Master File 960886. A settlement in 1998 provided cash compensation rights to
 19 substantially all overcharged buyers.

20 10. In 1994, I brought an indirect purchaser (Cartwright Act) class action suit, Preciado et
 al. v. Abbott Laboratories, Inc., et al., San Francisco County Superior Court action no. 962294, on
 21 behalf of California consumer purchasers of brand name prescription drugs, against the major
 manufacturers of such drugs for damages resulting from anti-competitive conduct. This action was
 22 coordinated in Judicial Council Coordination Proceedings nos. 2969, 2971, and 2972,
 Pharmaceutical Cases I, II, and III, San Francisco County Superior Court. In June 1995, we
 23 successfully moved for certification of a class of consumers who purchased brand name
 24 prescription drugs from pharmacies with ten or fewer retail locations in California.

25 11. In 1995, I filed Hamid v. Abbott Laboratories, Inc. et al., Alameda County Superior
 Court No. 753649 0, seeking certification of a class of consumers who purchased brand name
 26 prescription drugs from pharmacies with more than ten retail locations in California. This action
 was also coordinated in Pharmaceutical Cases I, II, and III. A 1998 settlement with some of the
 27 defendants provided for the distribution of brand name prescription drugs with a wholesale value
 28 of \$148.1 million to poor and medically underserved patients in California. A further settlement

1 with the remaining defendants provided for distribution of an additional \$22.9 million worth of
2 brand name prescription drugs on the same basis.

3 12. In 2000, together with co-counsel, I brought a class action suit, Wagh v. Metris Direct,
4 Inc., et al., San Francisco Superior Court action number 316788, on behalf of defendants' credit
5 card holders whose accounts were charged for financial services and club memberships of no
6 substantial worth without their consent. After plaintiff initiated discovery, defendants caused the
7 case to be removed to the U. S. District Court for the Northern District of California. It was
8 subsequently remanded after plaintiff's RICO allegations were dismissed by the District Court.
9 Plaintiff pursued an appeal of that decision but did not prevail and was also ultimately
10 unsuccessful in the California Superior Court litigation.

11 13. In 2006, together with co-counsel, I brought a class action suit, Barbush v. British
12 Airways., et al., U. S. District Court for the Northern District of California action number C 06
13 7214, on behalf of air passengers who were charged excessive fuel service charges as part of the
14 price of air tickets on major transatlantic air carriers. That action was coordinated in Air
15 Transportation Surcharge Antitrust Litigation, MDL 1793, in the U. S. District Court for the
16 Northern District of California. A settlement provided for over \$200 million in refunds to
17 passengers in the United States and the United Kingdom representing substantially the entire
18 overcharge.

19 14. In 2008, together with co-counsel, I brought a class action suit on behalf of Arthur
20 Cordisco and all others similarly situated, in the U. S. District Court for the Northern District of
21 California, seeking to recover damages resulting from a conspiracy to fix prices of automotive
22 filters and undertook to represent the class of indirect consumer purchasers. That action was
23 coordinated in In Re: Aftermarket Filters Antitrust Litigation MDL 1957, in the U. S. District
24 Court for the Northern District of Illinois. Settlements in 2012 provided for a recovery of more
25 than \$3.7 million to the indirect purchaser consumer class.

26 15. In 2008, together with co-counsel, I brought a class action suit, coordinated in U. S.
27 District Court for the Northern District of California TFT-LCD (Flat Panel) Antitrust Litigation -
28 MDL. No. 1827, seeking to recover damages resulting from an industry-wide conspiracy to fix
prices of LCD displays and undertook to represent the class of indirect purchasers. Among other
work, my office undertook extensive specialized analysis of foreign language documents and
information and provided financial backing. A settlement in 2012 provided for over a billion
dollars in recovery to the Indirect Class. It gave cash refunds to consumers for the entire
overcharge for each LCD device purchased.

EXHIBIT 2

EXHIBIT

IN RE CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION; MDL NO. 1917

TIME AND LODESTAR SUMMARY

INDIRECT PURCHASER PLAINTIFFS

Firm Name	Law Offices of Sherman Kassof	
Reporting Year	2008	

EXHIBIT

IN RE CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION; MDL NO. 1917
TIME AND LODESTAR SUMMARY
INDIRECT PURCHASER PLAINTIFFS

Firm Name	Law Offices of Sherman Kassof	
Reporting Year	2009	

EXHIBIT 2

**IN RE CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION; MDL NO. 1917
TIME AND LODESTAR SUMMARY
INDIRECT PURCHASER PLAINTIFFS**

Firm Name	Law Offices of Sherman Kassof	
Reporting Year	2010	

EXHIBIT 2

IN RE CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION; MDL NO. 1917

TIME AND LODESTAR SUMMARY

INDIRECT PURCHASER PLAINTIFFS

Firm Name	Law Offices of Sherman Kassof	
Reporting Year	2011	

EXHIBIT 2

IN RE CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION; MDL NO. 1917

TIME AND LODESTAR SUMMARY

INDIRECT PURCHASER PLAINTIFFS

Firm Name	Law Offices of Sherman Kassof	
Reporting Year	2012	

EXHIBIT 2

IN RE CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION; MDL NO. 1917

TIME AND LODESTAR SUMMARY

INDIRECT PURCHASER PLAINTIFFS

Firm Name	Law Offices of Sherman Kassof	
Reporting Year	2013	

EXHIBIT 2

IN RE CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION; MDL NO. 1917

TIME AND LODESTAR SUMMARY

INDIRECT PURCHASER PLAINTIFFS

IN RE CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION; MDL NO. 1917
TIME AND LODESTAR SUMMARY
INDIRECT PURCHASER PLAINTIFFS

Firm Name	Law Offices of Sherman Kassof	
Reporting Year	2014	

IN RE CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION; MDL NO. 1917
TIME AND LODESTAR SUMMARY
INDIRECT PURCHASER PLAINTIFFS

Firm Name	Law Offices of Sherman Kassof	
Reporting Year	2015	

IN RE CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION; MDL NO. 1917

TIME AND LODESTAR SUMMARY

INDIRECT PURCHASER PLAINTIFFS

Firm Name	Law Offices of Sherman Kassof											
Reporting Year	Inception through Present											

Year	1	2	3	4	5	6	7	8	9	10	11	12	Hours	Lodestar
2007	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$ -
2008	6.4	0.0	18.6	0.0	0.0	0.0	0.0	0.0	2.5	0.0	0.0	0.0	27.5	\$ 12,352.50
2009	27.1	0.0	1.0	0.0	0.0	0.0	0.0	0.0	41.9	0.0	0.0	0.0	70.0	\$ 35,000.00
2010	4.0	0.0	8.8	7.0	0.0	0.0	0.5	0.0	0.0	0.0	0.0	0.0	20.3	\$ 10,125.00
2011	0.4	0.0	0.0	0.0	0.0	0.0	850.5	0.0	0.0	0.0	0.0	0.0	850.9	\$ 297,675.00
2012	2.8	0.0	0.0	0.0	0.0	0.0	2035.7	16.9	0.0	0.0	0.0	0.0	2055.4	\$ 730,175.00
2013	0.0	0.0	0.0	0.0	0.0	0.0	1337.3	0.0	0.0	0.0	0.0	0.0	1337.3	\$ 530,995.00
2014	0.0	0.0	0.0	0.0	0.0	0.0	1615.0	0.0	0.0	0.0	0.0	0.0	1615.0	\$ 646,000.00
2015	0.0	0.0	0.0	0.0	0.0	0.0	318.6	0.0	0.0	0.0	0.0	0.0	318.6	\$ 127,440.00
	40.6	0.0	28.4	7.0	0.0	0.0	6157.6	16.9	44.4	0.0	0.0	0.0	6294.9	\$ 2,389,762.50

STATUS:

- (P) Partner
- (OC) Of Counsel
- (A) Associate
- (LC) Law Clerk
- (PL) Paralegal
- (I) Investigator

CATEGORIES:

- 1 Attorney Meeting/Strategy
- 2 Court Appearance
- 3 Client Meeting
- 4 Draft Discovery Requests or Responses
- 5 Deposition Preparation
- 6 Attend Deposition - Conduct/Defend
- 7 Document Review
- 8 Experts - Work or Consult
- 9 Research
- 10 Motions/Pleadings
- 11 Settlement
- 12 Trial

EXHIBIT 3

EXPENSE SUMMARY

INDIRECT PURCHASER PLAINTIFFS

Firm Name	Law Offices of Sherman Kassof
Reporting Year	Inception through Present

TYPE OF EXPENSE		TOTAL
Assessments	\$	50,000.00
Outside Copies		
In-house Reproduction /Copies		
Court Costs & Filing Fees		
Court Reporters 7 Transcripts		
Computer Research		
Telephone & Facsimile		
Postage/Express Delivery/Courier		
Professional Fees (investigator, accountant, etc.)		
Experts		
Witness / Service Fees		
Travel: Airfare	\$	673.60
Travel: Lodging/Meals	\$	767.20
Travel: Other		
Car Rental/Cabfare/Parking	\$	80.90
Other Expenses		
	\$	51,521.70